



Agate  
Mutual Telephone  
Coop. Assoc.

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February 25, 2009

TO: Marlene H. Dortch, Secretary  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S. W., Suite CY-B402  
Washington, D.C. 20554

From: Gail Pitzer, General Manager  
Agate Mutual Telephone Coop. Ass'n and its affiliate,  
Prairie Networks, LLC

*Gail Pitzer*  
General Manager  
CFO

RE: Certification of CPNI filing for March 1, 2009  
FCC Docket EB 06-36

On February 9, I sent in my certification for the above company and its affiliate but did not send you a second copy along with the originals. Please accept the enclosed copies to add with my original certification in which you received in your office on February 17.

I apologize for the problem but I was not told to send an extra copy. Please let me know if you need something else. Thank you.

Office: 719.764.2578

Fax: 719.764.2391

amtca@prairenetworks.net

P.O. Box 38

38619 Monroe Street

Agate, Colorado 80101.0038

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Date: February 9, 2008

Marlene H. Dortch, Secretary  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street S. W., Suite CY-B402  
Washington, D.C. 20554

**RE: Certification of CPNI Filing, March 1, 2009**

**FCC Docket EB 06-36**

**EB-06-TC-060**

Agate Mutual Telephone and its affiliate, Prairie Networks, LLC

In accordance with the Public Notice issued by the Enforcement Bureau on January 7, 2009 (DA 09-9), please find attached **Agate Mutual Telephone Coop Ass'n and its affiliate, Prairie Networks, LLC** annual compliance certificate for the most recent period, as required by section 64.2009(e) of the Commission's Rules, together with a statement of how its operating procedures ensure that it is or is not in compliance with the rules (Attachment A), an explanation of actions taken against data brokers, and a summary of customer complaints received in the past year concerning the unauthorized release of Customer Proprietary Network Information (CPNI)

Should you have any questions regarding this filing, please direct them to me at 719-764-2578 or in an email: [amtca@prairienetworks.net](mailto:amtca@prairienetworks.net).

Sincerely,

A handwritten signature in dark ink, appearing to read "Gail Pitzer" followed by a stylized flourish and the letters "CFO".

Gail Pitzer,  
General Manager

Cc: Best Copy and Printing, Inc., 445 12th Street, Suite CY-B402, Washington, DC 20554

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**Annual 47 C.F.R. § 64.2009(e) CPNI Certification** MAR - 2 2009

**EB Docket 06-36**

FCC Mail Room

Annual 64.2009(e) CPNI Certification for **2009**

Date filed: February 9, 2009

Name of company(s) covered by this certification: **Agate Mutual Telephone Coop Ass'n  
and its affiliate, Prairie Networks, LLC**

Form 499 Filer ID: Agate Mutual Telephone Coop Ass'n 814659  
Prairie Networks, LLC 826502

Name of signatory: Gail Pitzer

Title of signatory: General Manager/CEO

I, Gail Pitzer, certify that I am an officer of the companies named above, hereinafter "the company" and acting as an agent of the companies, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See 47 C.F.R. § 64.2001 et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules. ( see attach accompanying statement.

The company has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

Signed

  
Agate Mutual Telephone  
Prairie Networks, LLC

Gail Pitzer, Gen Mgr/CEO  
Gail Pitzer, CFO

**Attachment A**  
**Statement Concerning Procedures Ensuring Compliance with CPNI Rules**

The operating procedures of Agate Mutual Telephone Coop Ass'n, inclusive of Prairie Networks, LLC hereinafter the ( "Company") ensure that the Company complies with Part 64, Section 2001 *et.seq.* of the FCC rules governing the use of Customer Proprietary Network Information ("CPNI").

The Company has established a system by which the status of a customer's approval for the use of CPNI can be clearly established prior to the use of CPNI. The Company relies on the involvement of its supervisor/management to ensure that no use of CPNI is made without review of applicable rules and law.

The Company trains its personnel regarding when they are authorized to use CPNI, as well as when they are not authorized to use CPNI. Personnel must sign a verification form stating they have completed training and understand that any infraction of the CPNI procedures can result in disciplinary action being taken against them.

The Company has an express disciplinary process in place for personnel who create or are involved in an infraction of the CPNI rules and the Company's CPNI Operating Procedures.

The Company maintains records of its own sales and marketing campaigns via a log. These records include a description of each campaign, the specific CPNI used in the campaign, and the products and services that were offered as a part of the campaign. The Company has a supervisory review process for all outbound marketing. The marketing campaign log requires a supervisor to review, sign and date the log. These records are maintained for a minimum of one year.

The Company maintains records of customer approval for the use of CPNI that include a copy of the notice and the customer's "opt-out" written notification. These records are maintained for a minimum of one year.

The Company requires that customers be authenticated at the beginning of all customer initiated calls, online transactions, or in-store visit. In store visits require a valid photo ID.

The Company maintains a log of unauthorized use of CPNI, where law enforcement is required to be notified. This includes the date of discovery, notification to law enforcement, description of the breach, circumstances of the breach and a supervisor's signature and date. This log is maintained for a minimum of two years.